

OCT 05 2022

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TENNESSEE  
AT KNOXVILLE

Clerk, U. S. District Court  
Eastern District of Tennessee  
At Knoxville

UNITED STATES OF AMERICA

v.

██████████ and  
MICHAEL BELL

NO. 3:22-CR-99

JUDGES Crytzer / McCook

UNDER SEAL

INDICTMENT

The Grand Jury charges that, from in or about August, 2021, up to and including on or about September 1, 2021, in the Eastern District of Tennessee and elsewhere, the defendants, ██████████ and MICHAEL BELL, did combine, conspire, confederate, and agree with one another and others to knowingly, intentionally and without authority distribute fifty (50) grams or more of methamphetamine, its salts, isomers, and salts of its isomers, a Schedule II controlled substance, all in violation of Title 21, United States Code, Sections 846, 841(a)(1) and 841(b)(1)(A).

DRUG TRAFFICKING FORFEITURE ALLEGATIONS

The allegations contained in Count One of this Indictment are hereby realleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant to Title 21, United States Code, Section 853.

Upon conviction of an offense in violation of Title 21, United States Code, Sections 846 and/or 841, the defendants, ██████████ and MICHAEL BELL, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of such offense and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the

commission of the offense. The property to be forfeited includes but is not limited to the following:

**Money Judgment**

Proceeds the defendants [REDACTED] and MICHAEL BELL personally obtained as a result of the violations of Title 21, United States Code, Sections 841 and/or 846.

Pursuant to Title 21, United States Code, Section 853(p), each defendant shall forfeit substitute property, up to the value of the property subject to forfeiture, if by any act or omission of the defendant, the property, or any portion thereof:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty.

A TRUE BILL:

[REDACTED]  
GRAND JURY FOREPERSON

FRANCIS M. HAMILTON III  
UNITED STATES ATTORNEY

  
Cynthia F. Davidson  
Assistant United States Attorney